## THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY

## THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY

## Saber, Anna

From: Means, Miranda <miranda.means@kirkland.com>

**Sent:** Monday, March 7, 2022 1:34 PM

To: Steinberg, Joachim; #Thomson-Ross; jblumenfeld@morrisnichols.com; mflynn@morrisnichols.com

Cc: ROSS Lit Team; \*dmoore@Potteranderson.com1; \*bpalapura@potteranderson.com

**Subject:** RE: Thomson Reuters et al. v. ROSS Intelligence

## External Email

Dear Joachim,

We would direct your attention to TR-0908414-TR-908442 and TR-0908413, which are documents sufficient to show Thomson Reuters' overall licensing strategy. Per the agreement of the parties, our production of these documents should resolve this dispute.

Best regards, Miranda

#### **Miranda Means**

She/Her/Hers

#### **KIRKLAND & ELLIS LLP**

200 Clarendon Street, Boston, MA 02116 T +1 617 385 7419

M +1 617 320 9248

miranda.means@kirkland.com

From: Steinberg, Joachim < JSteinberg@crowell.com>

Sent: Thursday, March 3, 2022 5:27 PM

To: Means, Miranda <miranda.means@kirkland.com>; #Thomson-Ross <thomson-ross@kirkland.com>;

jblumenfeld@morrisnichols.com; mflynn@morrisnichols.com

Cc: ROSS Lit Team <Rosslitteam@crowell.com>; \*dmoore@Potteranderson.com1 <dmoore@Potteranderson.com>;

\*bpalapura@potteranderson.com <br/>bpalapura@potteranderson.com>

Subject: RE: Thomson Reuters et al. v. ROSS Intelligence

Miranda,

Can Thompson Reuters identify the documents it believes are responsive to these requests?

Kind regards, Joachim

### Joachim B. Steinberg

Pronouns: he/him/his Crowell & Moring LLP <u>isteinberg@crowell.com</u>

+1.415.365.7461 direct | +1.917.575.6244 mobile

From: Means, Miranda <miranda.means@kirkland.com>

Sent: Friday, February 25, 2022 8:32 AM

To: Steinberg, Joachim <JSteinberg@crowell.com>; #Thomson-Ross <thomson-ross@kirkland.com>;

jblumenfeld@morrisnichols.com; mflynn@morrisnichols.com

**Cc:** ROSS Lit Team < Rosslitteam@crowell.com >; \*dmoore@Potteranderson.com1 < dmoore@Potteranderson.com >; \*bpalapura@potteranderson.com < bpalapura@potteranderson.com >

Subject: RE: Thomson Reuters et al. v. ROSS Intelligence

### External Email

Dear Joachim,

We were perplexed by your letter of February 24, 2022, as this issue was resolved already. During the February 7, 2022 meet and confer with your colleagues, Mr. Ghaffari, Mr. Parker, and Ms. Berry, Thomson Reuters agreed to produce documents sufficient to show Thomson Reuters' overall licensing strategy, and ROSS agreed to that. Thomson Reuters has produced these documents.

Best regards, Miranda

#### Miranda Means

She/Her/Hers

\_\_\_\_\_

### **KIRKLAND & ELLIS LLP**

200 Clarendon Street, Boston, MA 02116 T +1 617 385 7419 M +1 617 320 9248

miranda.means@kirkland.com

**From:** Steinberg, Joachim < <u>JSteinberg@crowell.com</u>>

Sent: Thursday, February 24, 2022 3:19 PM

**To:** Means, Miranda <<u>miranda.means@kirkland.com</u>>; #Thomson-Ross <<u>thomson-ross@kirkland.com</u>>; jblumenfeld@morrisnichols.com; mflynn@morrisnichols.com

Cc: ROSS Lit Team < Rosslitteam@crowell.com >; \*dmoore@Potteranderson.com1 < dmoore@Potteranderson.com >;

\*bpalapura@potteranderson.com <bpalapura@potteranderson.com>

Subject: Thomson Reuters et al. v. ROSS Intelligence

Counsel,

Please see the attached correspondence.

Best regards, Joachim

### Joachim B. Steinberg

Pronouns: he/him/his jsteinberg@crowell.com

+1.415.365.7461 direct | +1.917.575.6244 mobile

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## Saber, Anna

**From:** Loverro, Eric <eric.loverro@kirkland.com>

**Sent:** Tuesday, April 26, 2022 5:02 AM **To:** Steinberg, Joachim; Means, Miranda

**Cc:** ROSS Lit Team; #Thomson-Ross; Flynn, Michael J.; jblumenfeld@morrisnichols.com;

\*dmoore@Potteranderson.com1; \*bpalapura@potteranderson.com

**Subject:** RE: Thomson Reuters v. ROSS

## External Email

### Joachim,

Plaintiffs strongly disagree with the characterization of Plaintiffs' production in ROSS's April 14, 2022 email and April 18, 2022 letter. In particular, with regard to ROSS's April 14 email, Plaintiffs only agreed to produce documents <u>sufficient to show</u> Plaintiffs' licensing strategy, and they have done so. Transfer pricing documentation or documents related to actual expenditures have nothing to do with Plaintiffs' overall licensing strategy, and are far afield from what Plaintiffs agreed to produce. In the interest of compromise, last week, Plaintiffs produced additional documents showing their licensing strategy. Though it is doubtful that a discounting policy would fall under what Plaintiffs agreed to produce in response to this request, Plaintiffs can confirm that there is no written discounting policy to produce. We trust Plaintiffs additional production of documents and investigation into the existence of a discounting policy resolves this dispute.

Plaintiffs will respond to ROSS's April 18 letter under separate cover.

Best, Eric

#### **Eric Loverro**

### **KIRKLAND & ELLIS LLP**

601 Lexington Avenue, New York, NY 10022 T +1 212 390 4243 M +1 646 884 2971 F +1 212 446 4900

eric.loverro@kirkland.com

From: Steinberg, Joachim < JSteinberg@crowell.com>

Sent: Monday, April 25, 2022 2:06 PM

To: Means, Miranda <miranda.means@kirkland.com>

Cc: ROSS Lit Team <Rosslitteam@crowell.com>; #Thomson-Ross <thomson-ross@kirkland.com>; Flynn, Michael J.

 $<\!mflynn@morrisnichols.com>; jblumenfeld@morrisnichols.com; *dmoore@Potteranderson.com1$ 

<dmoore@Potteranderson.com>; \*bpalapura@potteranderson.com <br/>bpalapura@potteranderson.com>

Subject: Thomson Reuters v. ROSS

Miranda,

ROSS asked Plaintiffs to either produce documents related to its licensing strategy or provide a time for a final meet-and-confer on that issue on April 14, 20221. See J. Steinberg Email to M. Means, Apr. 14, 2022. ROSS made the same request regarding Plaintiffs' production of documents in response to RFPs Nos. 100, 101, 102, 123, 124, 125, 126, and 141. See J. Steinberg Letter to M. Means, Apr. 18, 2022. We have not heard back from you on either. Please provide your availability for a final meet-and-confer on both of these issues on Friday, April 29.

Kind regards, Joachim

## Joachim B. Steinberg

Pronouns: he/him/his jsteinberg@crowell.com

+1.415.365.7461 direct | +1.917.575.6244 mobile

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Crowell & Moring LLP 3 Embarcadero Center 26th Floor San Francisco, CA 94111

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Joachim B. Steinberg jsteinberg@crowell.com (415) 365-7461 direct Crowell & Moring LLP 3 Embarcadero Center 26th Floor San Francisco, CA 94111 +1.415.986.2800 main +1.415.986.2827 fax

June 9, 2022

### **VIA E-MAIL**

Miranda Means Kirkland & Ellis LLP 200 Clarendon St. Boston, MA 02116 Miranda.means@kirkland.com

Re: Thomson Reuters Enterprise Centre GmbH et al. v. ROSS Intelligence, Inc., Case No. 20-613-LPS, Plaintiffs' Deficient Document Production (Licensing Documents)

### Dear Miranda:

We write on behalf of ROSS Intelligence, Inc. ("ROSS") in response to Plaintiffs Thomson Reuters Enterprise Center GmbH and West Publishing Corporation's (collectively "Plaintiffs") production of licensing strategy documents.

ROSS first raised this issue in August 2021 in connection with Plaintiffs' discovery responses served in July 2021. See K. Ghaffari Ltr. To J. Simmons, Aug. 3, 2021. After protracted meet and confer efforts spanning through late February 2022, Plaintiffs still had not produced responsive documents despite conceding that these documents are discoverable and having agreed to produce them. In February 2022, ROSS requested that Plaintiffs immediately search for and produce documents responsive to Request Nos. 87 and 87 or make themselves available for a meet and confer. J. Steinberg Ltr. To M. Means, Feb. 24, 2022. In response, Plaintiffs claimed to have produced documents sufficient to show Plaintiffs' licensing strategy and identified two documents as responsive: TR-0908413 and TR-0908414. Email from M. Means, Feb. 25, 2022, 8:32 AM; see also Email from M. Means, Mar. 7, 2022, 4:34 PM ("Plaintiffs March 7 Email"). ROSS requested a meet and confer to discuss the two identified documents on April 14 and enumerated categories of documents that would likely respond to these requests. Email from J. Steinberg, Apr. 14, 2022, 6:00 PM. Plaintiffs continued to refuse to produce any other responsive documents, and once again claimed that it had already produced documents sufficient to show licensing strategy. Email from E. Loverro, Apr. 26, 2022, 5:02 AM. ROSS requested a final meet and confer, Email from J. Steinberg, Apr. 27, 2022, 2:25 PM, but Plaintiffs insisted that a final meet and confer was "premature." Email from E. Loverro, Apr. 29, 2022, 9:54 AM. The parties met and conferred telephonically on May 16, 2022.

Plaintiffs previously identified TR-0908414-TR-908442 and TR-0908413 as sufficient to show Thompson Reuter's licensing strategy. *See* Plaintiffs March 7 Email. These documents do not show Plaintiffs' licensing strategy. TR-0908413 is a one-page graphic that describes

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"vetting" certain customers. The document does not say if Plaintiffs license the Westlaw Content at issue in this litigation to each of the listed categories of customer, how Plaintiffs license the Westlaw Content at issue in this litigation to those categories of customers, or the license fees paid by each of these customers. TR-0908414 is a document titled "Thomson Reuters Legal 2021 General Policies Addendum." This document relates to the policies governing Plaintiffs' Sales Professionals, such as policies about commission payment, unprofessional conduct, travel expenses, bonuses, performance metrics, terms of employment. These policies do not show Plaintiffs' licensing strategy, *i.e.*, how Plaintiffs decided what to license, to whom it is licensed, and at what license fee. Moreover, the date of the document post-dates any of the activities at issue in this case. Certainly, ROSS is entitled to a document that pertains to the dates at issue in this case—2015 to 2020.

Plaintiffs later produced another set of documents in connection with Plaintiffs' April 26 email, but this document, TR-0908708 still does not satisfy Plaintiffs' production obligations. TR-0908708 is a 2019 Sales Policies and Procedures document

It does not describe or discuss the licensing strategy for the Westlaw Content at issue in this litigation or otherwise show why Plaintiffs license the Westlaw Content at certain prices, how Plaintiffs determine the licensing value, what costs related to the Westlaw Content are considered to determine licensing value, and thus is not responsive to these requests.

During a telephonic meet and confer on May 16, 2022, Plaintiffs attempted to shift the burden to ROSS to identify documents missing from Plaintiffs' production. It is not ROSS's burden to guess at the type of documents that Plaintiffs have in their possession and ROSS cannot accurately guess what particular licensing strategy documents Plaintiffs have within their possession, custody, or control. But ROSS suspects that Plaintiffs have documents in the following categories that would respond to Requests 87 or 88:

- Documents showing decisions by Plaintiffs to license the Westlaw Content at issue in this litigation;
- Documents showing decisions by Plaintiffs determining what Westlaw Content at issue in this litigation to license;
- Documents showing pricing decisions by Plaintiffs for the Westlaw Content at issue in this litigation
- Documents showing why Plaintiffs license the Westlaw Content at issue in this litigation at different prices;
- Documents showing how Plaintiffs determine the licensing value for the Westlaw Content at issue in this litigation;
- Documents showing what costs related to the Westlaw Content at issue in this litigation do Plaintiffs consider to determine licensing;

- Documents showing decisions by Plaintiffs to license or not license the Westlaw Content at issue in this litigation to certain categories of customers;
- Documents showing Plaintiffs' decision to offer or employ a discounting policy for the Westlaw Content at issue in this litigation;
- Documents showing the discounting policy
- The transfer pricing documentation for prepared annually for each of the Westlaw Content at issue in this litigation as referenced in TR-0358927
- Documents showing the actual expenditures in 2018 and 2019 for "Westlaw US" initiatives including "Westlaw EDGE," "WLN General Enhancements," "Global Intellectual Property," and "JWB-Judicial Workbench." As identified in TR-0908447;
- Documents showing how costs affect Plaintiffs licensing strategy for the Westlaw Content at issue in this litigation
- Documents identifying the factors that Plaintiffs consider when determining the licensing numbers for the Westlaw Content at issue in this litigation;
- Documents showing the costs associated with producing each of the Westlaw Content at issue in this litigation; and
- Documents showing the effect that the costs associated with producing each of the Westlaw Content at issue in this litigation has on the licensing prices for such content.

All of the above categories of documents would respond to at least one of the document requests raised in this letter. Please confirm by June 13, 2022 whether Plaintiffs will be producing such documents and provide your availability for a final meet and confer the week of June 13, 2022.

ROSS reserves all rights and waives none.

Very truly yours,

Joachim B. Steinberg

Joachn B. Steinly

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## WestlawNext®

## Searching with Topic and Key Numbers

Retrieving Cases on WestlawNext

Each legal issue in a case published by Thomson Reuters is identified, summarized in a headnote, and assigned a topic and key number in the West Key Number System®. If you are fortunate enough to find a case on point early in your research, you can use the topic and key numbers in this case to search for other cases discussing the same legal issues. You can also use the West Key Number Digest to search for topic and key numbers and then retrieve headnotes classified under those topic and key numbers.

### **Searching with Topic and Key Numbers**

If you have already identified a topic and key number associated with a legal issue you are researching, you can retrieve cases or headnotes in the following ways:

- Run a search at the home page using that topic and key number. For example, to search for cases with headnotes classified under topic 115 (Damages) and key number 101 (Expenses), type 115k101 in the search box at the top of the page, change the jurisdiction if necessary, and click Search.
- Run a search at the home page using that topic and key number in conjunction with other search terms. For example, to search for cases with headnotes classified under topic 115 and key number 101 that relate to medical expenses, type a search such as 115k101 /p medical in the search box (Figure 1).

**WestlawNext** - 115k101 /p medical All Federa III Browse State Materials Topics Matter Benchmark Reports Cases Briefs Dockets reports to effectively evaluate Statutes & Court Rules Trial Court Documents News expenses. Learn more Regulations Expert Materials Sample Agreements Administrative Decisions & Jury Verdicts & Settlements Patents Proposed & Enacted Public Records 2 Trial Court Orders Legislation Trial & Oral Argument Secondary Sources Proposed & Adopted Transcripts Regulations Directories **Business Information** International Materials

Figure 1. Topic and key number search at the home page

When you are viewing a headnote in a case, click the topic or keyline above the headnote or click a topic or key number in the classification hierarchy next to the headnote (Figure 2). A list of headnotes classified under that topic or key number—from cases in the same jurisdiction as the case you were viewing—is displayed.

Note If the classification hierarchy is not displayed next to the headnote, click Change View at the beginning of the West Headnotes section of the opinion (see Figure 2).

WestlawNext is available on the Web at next.westlaw.com.

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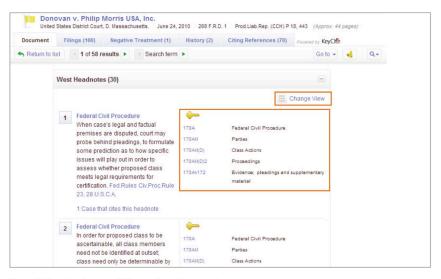


Figure 2. Case headnote and West topic and key numbers

## **Using the West Key Number Digest**

The West Key Number Digest contains the complete topic and key number outline used by our attorney-editors to classify headnotes. The West Key Number Digest helps you identify topic and key numbers related to your issue and to headnotes classified under those topic and key numbers.

To access the West Key Number Digest on WestlawNext, click the **Tools** tab in the *Browse* section of the home page, then click **West Key Number System** (Figure 3). The West Key Number System page, which lists all West topics, is displayed (Figure 4). A list of West topics can be found on pages 5–7 of this guide.

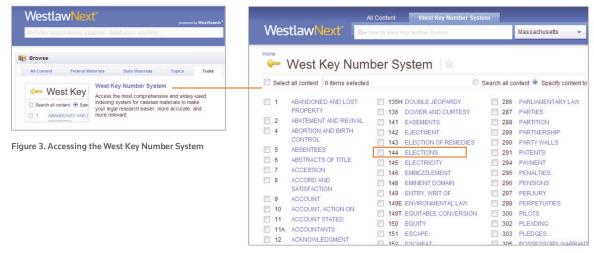


Figure 4. West Key Number System page

Browse the list of topics to find the topic related to your issue. Click the topic, e.g., **Elections**, to display the topic page, which contains the key numbers classified under that topic (Figure 5). If necessary, click the plus (+) symbols to display the key numbers.



Figure 5. Topic page

### **Retrieving Case Headnotes**

At a topic page, you can select key numbers and then retrieve case headnotes classified under those key numbers. Complete these steps to retrieve case headnotes:

- 1. Select **Specify content to search** if it is not already selected. If necessary, click **Expand All** to display all key numbers classified under that topic. Then select the check box next to each key number for which you want to retrieve case headnotes.
- 2. Change the jurisdiction at the top of the page if necessary.
- 3. Click **View Headnotes**. The headnotes are displayed in the right column under the key numbers to which they are classified (Figure 6).

To retrieve headnotes from another jurisdiction, click **Change** next to the current jurisdiction. The Jurisdiction selector is displayed. Make your selections and click **Apply**, then click **Search** at the top of the page.



Figure 6. Case headnotes

To view the full text of a case in the list, click its title. You can also click the KeyCite® status flag, if available, to view the KeyCite result for the case.

### **Narrowing Your Result**

You can narrow the list of headnotes to those that contain specific terms. Type a term or a Terms and Connectors search, e.g., "absentee ballot!", in the Search within results text box under Narrow in the left column and click Continue (Figure 7). Click Apply Filters to display only those headnotes that contain your terms.



Figure 7. Search within results

## **Saving or Printing Case Headnotes**

You can save case headnotes in a folder or print, email, or download them.

## Saving Headnotes in Folders

When you are viewing a list of case headnotes, select the check box next to each headnote you want to save and click the **Save to Folder** icon () on the toolbar. Select the folder in which you want to save the headnotes and click **Save**.

#### **Printing Headnotes**

When you are viewing a list of case headnotes, select the check box next to each headnote you want to print or deliver. Then click the Print ( ), Email ( ), Download ( ), or Kindle ( ) icon on the toolbar, or click the arrow next to the delivery icon and choose Print, Email, Download, or Kindle from the menu. In the dialog box that is displayed, you can choose to print or deliver the headnotes or the cases that contain the headnotes.

## **West Digest Topics and Their Numerical Designations**

		20		7611		11.0	5 15 1
1	Abandoned and Lost Property	38	Assignments	76H	Children Out-of-Wedlock	116	Dead Bodies
2	Abatement and Revival	40	Assistance, Writ of	78	Civil Rights	117	Death
4	Abortion and Birth Control	41	Associations	79	Clerks of Courts	117G	Debt, Action of
5	Absentees	42	Assumpsit, Action of	80	Clubs	117T	Debtor and Creditor
6	Abstracts of Title	43	Asylums and Assisted Living Facilities	81	Colleges and Universities	118A	Declaratory Judgment
7	Accession	44	Attachment	82	Collision	119	Dedication
8	Accord and Satisfaction	45	Attorney and Client	83	Commerce	120	Deeds
9	Account	46	Attorney General	83H	Commodity Futures Trading Regulation	122A	Deposits and Escrows
10	Account, Action on	47	Auctions and Auctioneers	83T	Common Interest Communities	123	Deposits in Court
11	Account Stated	48	Audita Querela	84	Common Lands	124	Descent and Distribution
11A	Accountants	48A	Automobiles	85	Common Law	125	Detectives and Security Guards
12	Acknowledgment					126	Detinue
13	Action	48B	Aviation	89	Compromise and Settlement	129	Disorderly Conduct
14	Action on the Case	49	Bail	90	Confusion of Goods	130	Disorderly House
15	Adjoining Landowners	50	Bailment	91	Conspiracy	131	District and Prosecuting
15A	Administrative Law and	51	Bankruptcy	92	Constitutional Law		Attorneys
	Procedure	52	Banks and Banking	92B	Consumer Credit	132	District of Columbia
16	Admiralty	54	Beneficial Associations	93	Contempt	133	Disturbance of Public Assemblage
17	Adoption	55	Bigamy	95	Contracts	134	Divorce
18	Adulteration	56	Bills and Notes	96	Contribution	135	Domicile
19	Adultery	58	Bonds	96H	Controlled Substances		Double Jeopardy
20	Adverse Possession	59	Boundaries	97C	Conversion and Civil Theft	136	Dower and Curtesy
21	Affidavits	60	Bounties	98	Convicts	141	Easements
23	Agriculture	61	Breach of Marriage Promise	99	Copyrights and Intellectual		
24	Aliens, Immigration, and	63	Bribery	100	Property	142	Ejectment
25	Citizenship	64	Bridges	100	Coroners	143	Election of Remedies
25	Alteration of Instruments	65	Brokers	101	Corporations and Business Organizations	144	Elections
25T	Alternative Dispute Resolution	66	Building and Loan Associations	102	Costs	145	Electricity
26	Ambassadors and Consuls	67	Burglary	103	Counterfeiting	146	Embezzlement
27	Amicus Curiae	69	Cancellation of Instruments	104	Counties	148	Eminent Domain
28	Animals	70	Carriers	105	Court Commissioners	149	Entry, Writ of
29	Annuities	71	Cemeteries	106	Courts		Environmental Law
29T	Antitrust and Trade	72	Census	107	Covenant, Action of	149T	Equitable Conversion
	Regulation	73	Certiorari	108	Covenants	150	Equity
30	Appeal and Error	74	Champerty and Maintenance		Credit Reporting Agencies	151	Escape
31	Appearance	75	Charities	110	Criminal Law	152	Escheat
34	Armed Services	76	Chattel Mortgages	111	Crops	154	Estates in Property
35	Arrest	76A	Chemical Dependents	113	Customs and Usages	156	Estoppel
36	Arson	76D	Child Custody	114	Customs Duties	157	Evidence
37	Assault and Battery	76E	Child Support	115	Damages	158	Exceptions, Bill of
				כוו	Dumages	159	Exchange of Property

160	Exchanges	203	Homicide	250	Mandamus	302	Pleading
161	Execution	205	Husband and Wife	251	Manufactures	303	Pledges
162	Executors and Administrators	205H	Implied and Constructive Contracts	252	Maritime Liens	305	Possessory Warrant
163	Exemptions	206	Improvements	253	Marriage	306	Postal Service
164	Explosives			256	Mayhem	307	Powers
165	Extortion and Threats	207	Incest	257	Mechanics' Liens	307A	Pretrial Procedure
166	Extradition and Detainers	208	Indemnity	257A	Mental Health	308	Principal and Agent
167	Factors	209	Indians	258A	Military Justice	309	Principal and Surety
168	False Imprisonment	210	Indictment and Information	259	Militia	310	Prisons
169	False Personation	211	Infants	260	Mines and Minerals	311	Private Roads
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170A	Federal Civil Procedure	213	Innkeepers	266	Mortgages		Confidentiality
170B	Federal Courts	216	Inspection	267	Motions	313	Process
171	Fences	217	Insurance	268	Municipal Corporations	313A	Products Liability
172	Ferries	218	Insurrection and Sedition	269	Names	314	Prohibition
174	Fines	219	Interest	271	Ne Exeat	315	Property
175	Fires	220	Internal Revenue	272	Negligence	315H	Prostitution
176	Fish	221	International Law	273	Neutrality Laws	315P	Protection of Endangered
177	Fixtures	222	Interpleader	274	Newspapers	2157	Persons
178	Food	223	Intoxicating Liquors	275	New Trial	315T	Public Amusement and Entertainment
179		224	Joint Adventures	276	Notaries	316E	Public Assistance
	Forcible Entry and Detainer	226	Joint Tenancy	277		316H	Public Contracts
180	Forfeitures	227	Judges		Notice	317	Public Lands
181	Forgery	228	Judgment	278	Novation		Public Utilities
183	Franchises	229	Judicial Sales	279	Nuisance	318	Quieting Title
184	Fraud	230	Jury	280	Oath	319	Quo Warranto
185	Frauds, Statute of	231	Justices of the Peace	281	Obscenity	319H	Racketeer Influenced and
186	Fraudulent Conveyances	231E	Kidnapping	282	Obstructing Justice	וופוכ	Corrupt Organizations
187	Game		Labor and Employment	283	Officers and Public Employees	320	Railroads
188	Gaming	233	Landlord and Tenant	284	Pardon and Parole	321	Rape
189	Garnishment		Larceny	285	Parent and Child	322	Real Actions
190	Gas	237	Libel and Slander	286	Parliamentary Law	323	Receivers
191	Gifts	238	Licenses	287	Parties	324	Receiving Stolen Goods
192	Good Will		Liens	288	Partition	325	Recognizances
193	Grand Jury	239		289	Partnership	326	Records
195	Guaranty	240	Life Estates	290	Party Walls	327	Reference
196	Guardian and Ward	241	Limitation of Actions	291	Patents	328	Reformation of Instruments
197	Habeas Corpus	242	Lis Pendens	294	Payment	330	Registers of Deeds
198	Hawkers and Peddlers	245	Logs and Logging	295	Penalties	331	Release
198H	Health	246	Lost Instruments	296	Pensions		
200	Highways	247	Lotteries	297	Perjury	332	Religious Societies
201	Holidays	248	Malicious Mischief	298	Perpetuities	333	Remainders
202	Homestead	249	Malicious Prosecution	300	Pilots	334	Removal of Cases
						335	Replevin

## **6** Searching with Topic and Key Numbers

## **WestlawNext Quick Reference Guide**

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337	Rescue	354	Shipping	373	Tenancy in Common	396	Unlawful Assembly
338	Reversions	355	Signatures	374	Tender	396A	Urban Railroads
339	Review	356	Slaves	375	Territories	398	Usury
340	Rewards	356A	Social Security and Public	378	Time	399	Vagrancy
341	Riot	257	Welfare	379	Torts	400	Vendor and Purchaser
342	Robbery	357	Sodomy	380	Towage	401	Venue
343	Sales	358	Specific Performance	381	Towns	402	War and National Emergency
344	Salvage	359	Spendthrifts	382T	Trademarks	403	Warehousemen
345	Schools	360	States	384	Treason	404	Waste
346	Scire Facias	361	Statutes	385	Treaties	405	Water Law
347	Seals	362	Steam	386	Trespass	406	Weapons
348	Seamen	363	Stipulations	387	Trespass to Try Title	407	Weights and Measures
349	Searches and Seizures	365	Submission of Controversy	388	Trial	408	Wharves
349A	Secured Transactions	366	Subrogation	390	Trusts	409	Wills
349B	Securities Regulation	367	Subscriptions	391	Turnpikes and Toll Roads	410	Witnesses
350	Seduction	368	Suicide	392	Undertakings	411	Woods and Forests
350H	Sentencing and Punishment	369	Sunday	392T	Unemployment Compensation	413	Workers' Compensation
351	Sequestration	370	Supersedeas	393	United States	414	Zoning and Planning
352	Set-Off and Counterclaim	371	Taxation	394	United States Magistrates	450	Merit Systems Protection





very legal researcher's goal is to find the best way to zero in on a particular legal issue and quickly find on-point cases. However, with the huge amount of information available on the internet, is it really possible to find the perfect case quickly? Even if you are able to find a relevant case quickly, can you feel confident that there isn't another case out there that is a better fit? Surprisingly, the answer to both of these questions is yes. The best way for an attorney to ensure that they are relying on arguments that reflect the true nature of the law is to use <a href="KeyCite">KeyCite</a> on <a href="Westlaw Edge">Westlaw Edge</a>.

### **About the Key Number System**

The Key Number System was the first of its kind when created by West Publishing more than 100 years ago. A master classification system of U.S. law, the Key Number System allows our Attorney Editors to organize cases by corresponding legal issues and topics. Our Key Number Digest books help legal researchers quickly and efficiently find relevant case law among the stacks and shelves in vast law libraries. Few analog tools have made the transition to our digital world better than Key Numbers, and using Key Numbers on Westlaw can make quick work of complicated legal research tasks. Use any of the methods below to take advantage of West's Key Number System, integrated with KeyCite on Westlaw and Westlaw Edge.

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## Browse comprehensive Key Numbers to pinpoint legal concepts

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homepage link to "Key Numbers" allows you to browse to level of specificity by topic. Alternatively, a link appears under the Content Pages autosuggestion when you start to type Key Numbers in the search bar at the top of the screen. WestSearch Plus on Westlaw Edge provides superior research suggestions right from the search box, then provides the most relevant text for your legal query without the need to dive into a result list.

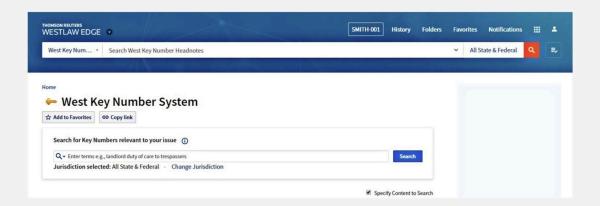




By clicking these links, you are brought to the West Key Number System content page. Narrowing by topic will ultimately take you to a list of headnotes, the equivalent of a particular Key Number Digest in print. From here, you can **run a search or narrow by jurisdiction** as needed.



If you navigate back to the main Key Number page, you can see two options: search headnotes or Key Numbers and topics. The main search bar at the top of the screen will search across all of the headnotes within the Key Number System. This is helpful to find headnotes related to your issue and then see where they are classified within the Key Number System. The second search bar in the gray box searches only Key Numbers and topics. This option helps to find specific Key Numbers that use the language you have, whereas the search in headnotes provides a broader option to find helpful headnotes or related Key Numbers.



#### LOCATE cases discussing similar legal concepts and principles

Finding one case on point will directly lead you to others through Key Numbers. Headnotes are summaries of specific points of law addressed in a particular case, drafted by Westlaw Attorney Editors to ensure that topics include relevant cases even where those cases may use atypical language. Applicable headnotes are always listed at the top of a case, and provide a good alternative entry point into the Key Number System. After reviewing cases and locating a helpful headnote, click into the Key Number System through the classification hierarchy next to the headnote. (You can change the headnote presentation using the view options at the top right of the first headnote.)



After choosing a Key Number, you can **search within** using the box along the left, or you may look in a different jurisdiction by using the **Change link** under the Key Number heading at the top of the page.





#### SEARCH Key Numbers using comprehensive WestSearch

Finally, you can search Key Numbers across all Westlaw content by running a plain language search from the global search box on the homepage. You will see a link to Key Numbers in the gray bar along the left after running a search.

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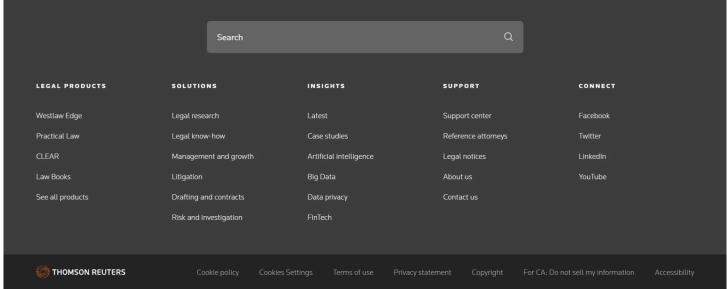
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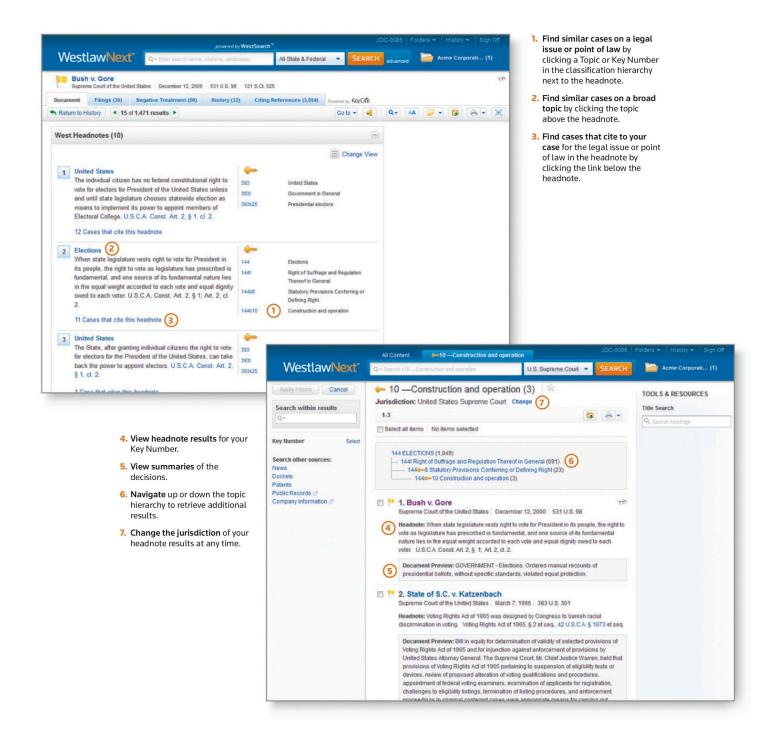
- It is comprehensive and precise. West attorney-editors index cases into more than 400 topics and 98,000 points of law, enabling you to quickly find other cases that address your exact legal issue in any jurisdiction.
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INSIDE: See how to use the West Key Number System and how the WestSearch algorithm automatically leverages it for you.



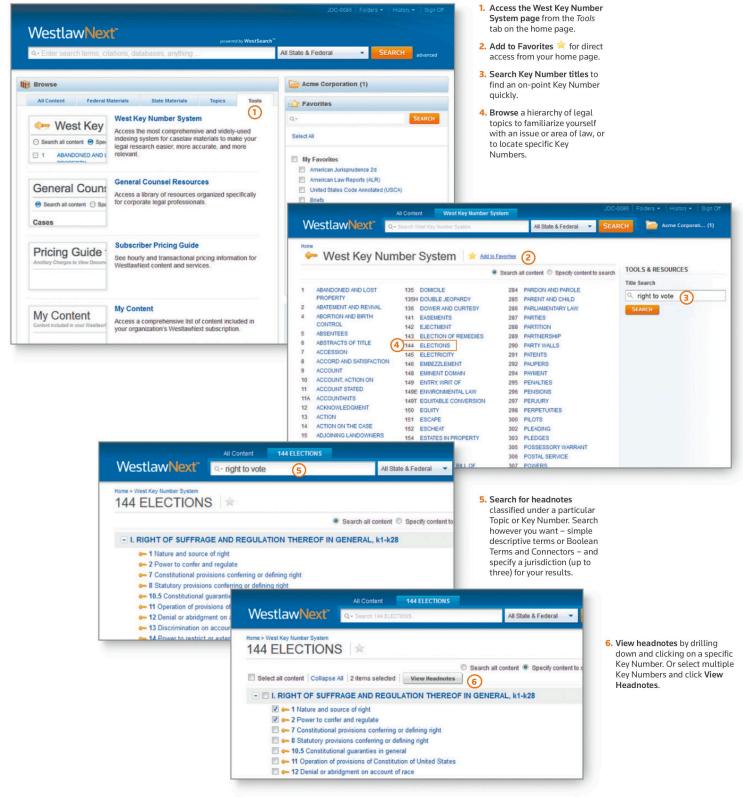
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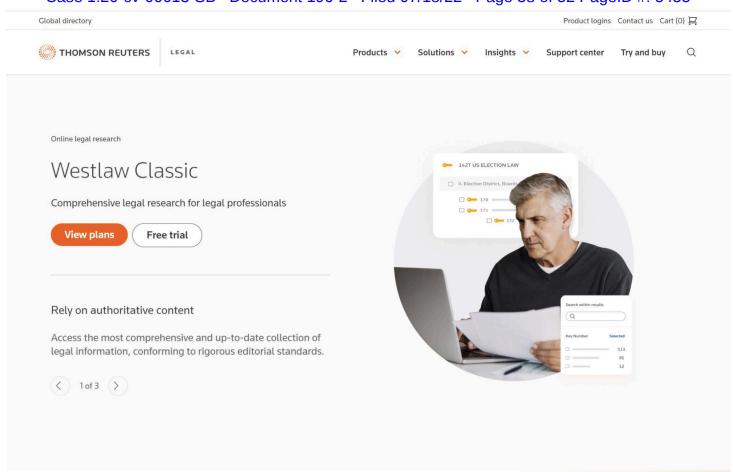
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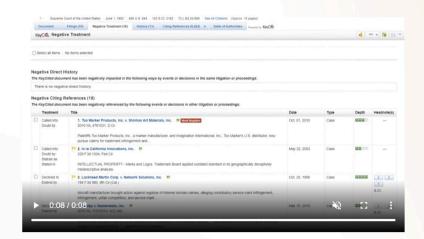


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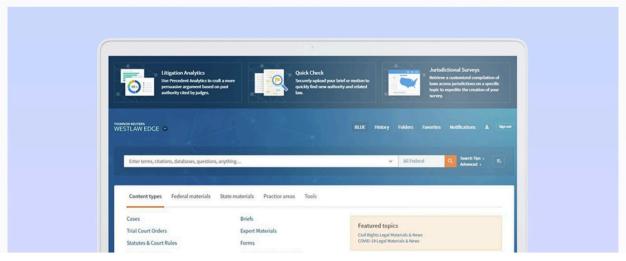
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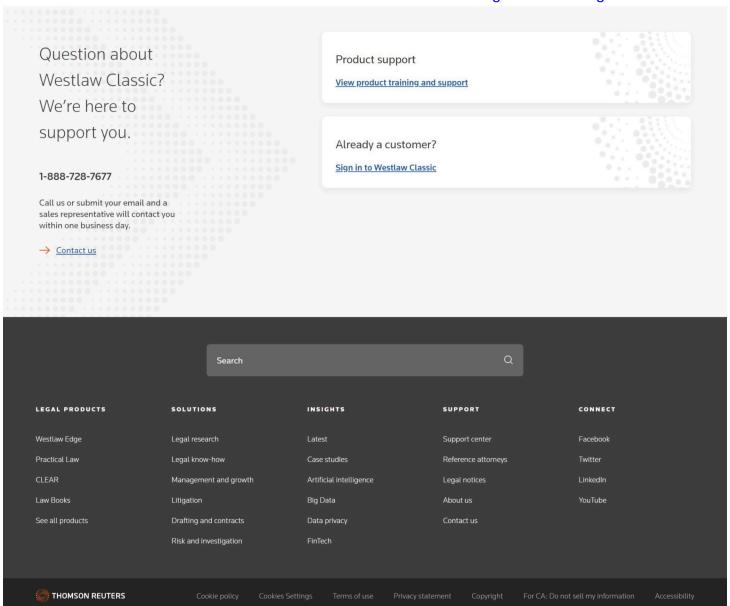
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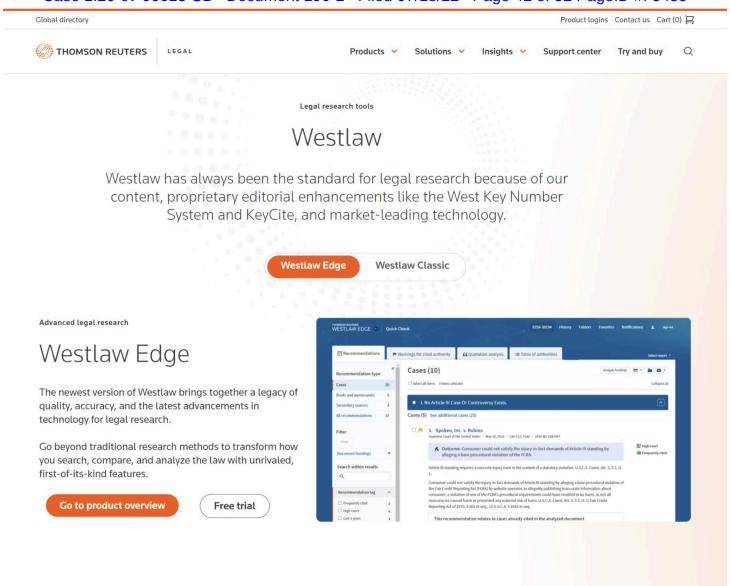
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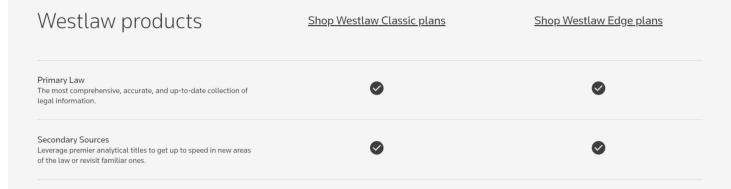
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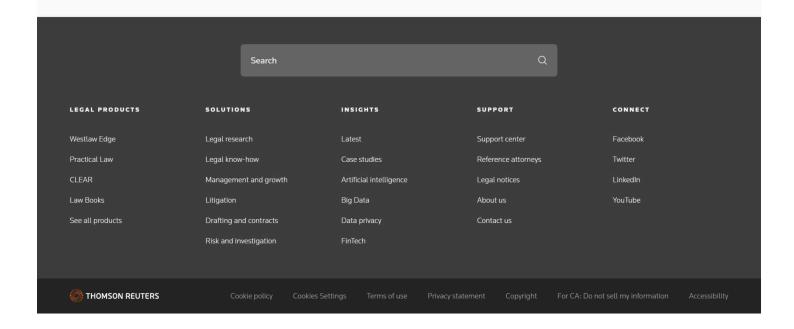
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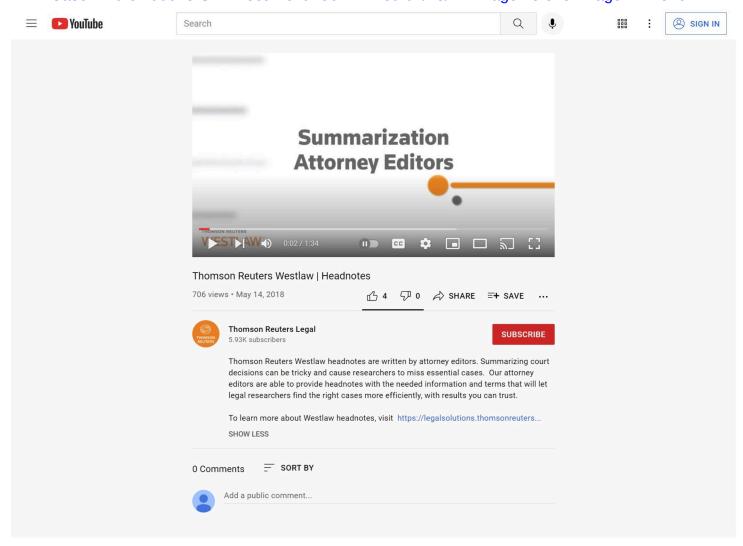
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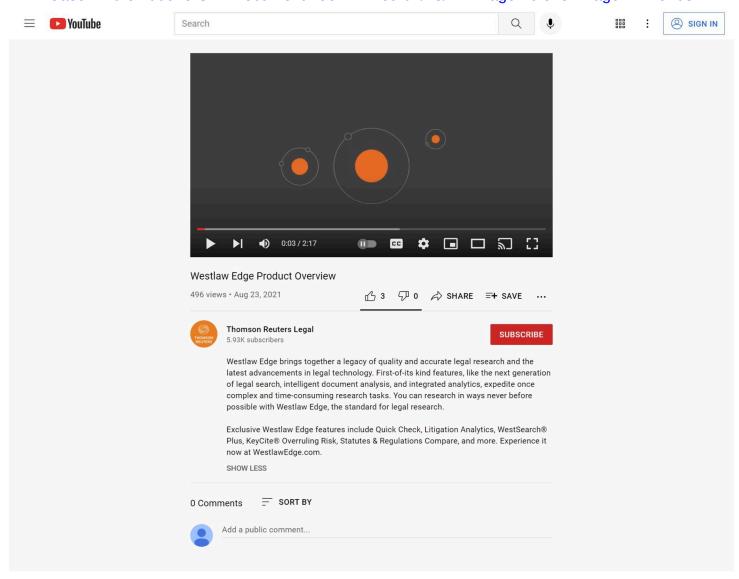
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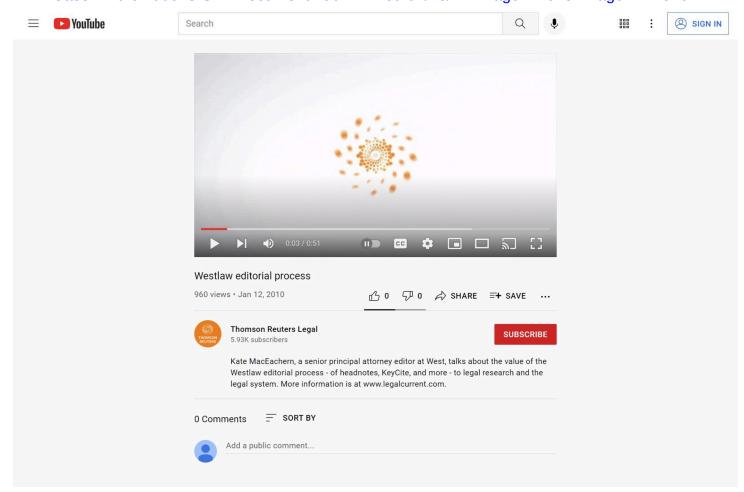
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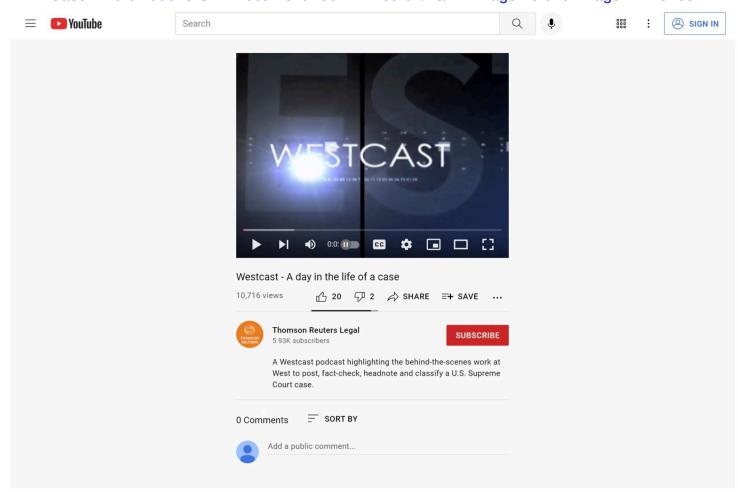
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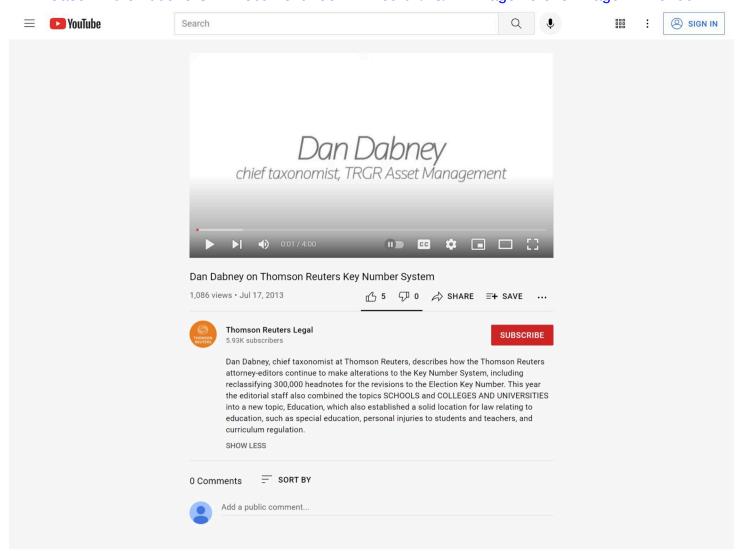


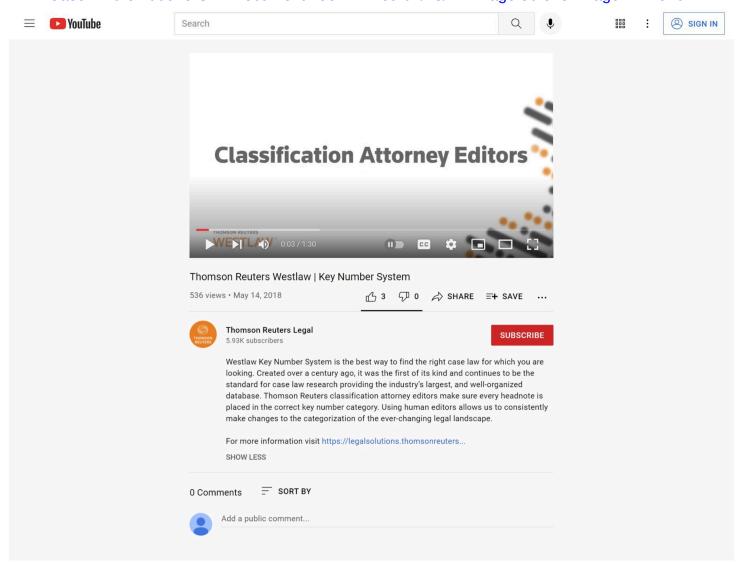












# EXHIBIT 32

# THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY